



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 5, 2010

Jennie Goldberg, Project Coordinator
Environmental Affairs Division
Seattle City Light
P.O. Box 34023
Seattle, WA 98124-4023



Re: Georgetown Steam Plant- Work Plan to Determine Nature and Extent of Remaining Soil Contamination.

Dear Ms. Goldberg:

Thank you for your letter of March 16, 2010, stating that the City of Seattle wants to complete the investigation and cleanup of the parcel containing the Georgetown Steam Plant (GTSP). From your letter, it is my understanding that Seattle City Light intends to characterize the nature and extent of remaining contaminated soil at the site and then address remaining contamination as required by MTCA.

The Washington State Department of Ecology hereby approves of Seattle City Light's plans to move forward with the work plan for site characterization pending resolution of the issues stated below. As you prepare the work plan, you must consider the following issues:

While your letter indicates that the remaining contaminated soil will be addressed as required by MTCA, some of the contaminated soils may have concentrations of polychlorinated biphenyls (PCBs) or other contaminants that trigger the application of federal or other regulatory requirements. The work plan must include an analysis of applicable or relevant and appropriate requirements (ARARs) that might be applied to the cleanup.

Your letter suggests that contamination is not presently moving off the GTSP property. However, to substantiate this assumption, additional groundwater investigation will be necessary to characterize contaminant concentrations near the property line. Your letter does not make any reference to additional monitoring well installation or groundwater sampling.

Site characterization must determine the vertical and horizontal extent of contaminated soil and groundwater. Soil and groundwater investigations must be deep enough to define the full vertical extent of contamination. Investigations by the Boeing Company near the GTSP and by Seattle City Light at the GTSP suggest that the horizontal extent of soil and groundwater contamination might extend beyond the boundary of the GTSP property that is not leased to others. The work plan must address how the full horizontal extent of contamination will be determined beyond the limits of the GTSP property.

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Jennie Goldberg

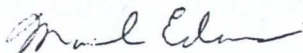
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Recent sampling and testing of stormwater and storm drain solids at North Boeing Field (NBF) suggests that there are potential contaminants of concern other than PCBs that will need to be addressed at the NBF/GTSP site. The work plan must address all potential contaminants of concern, not just PCBs. In addition, the work plan must specify the appropriate analytical methods and detection limits for each potential contaminant of concern. Detection limits will need to be low enough to address ARARs that might be applied to the cleanup.

Ecology is looking forward to your work on this project. If you have any questions regarding this letter, please contact me at 425-649-7070.

Sincerely,



Mark Edens,
Project Manager

cc: Karen Keeley, EPA
Margaret McCauley, EPA
Scott Downey, EPA
✓ Dan Duncan, EPA
Peter Dumaliang, King County International Airport
Carl Bach, The Boeing Company
Rick Thomas, NWRO-TCP
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